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15 UNITED STATES DISTRICT COURT  
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17 NORTHERN DISTRICT OF CALIFORNIA  
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19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA, ) NO. CR 21-105 VC  
21 Plaintiff, ) [Filed March 11, 2021]  
22 v. ) NOTICE OF RELATED CASE IN A CRIMINAL  
23 ROBERT JESUS BLANCAS, ) ACTION  
24 Defendant. )

25 UNITED STATES OF AMERICA, ) NO. CR 21-121 JD  
26 Plaintiff, ) [Filed March 23, 2021]  
27 v. ) NOTICE OF RELATED CASE IN A CRIMINAL  
28 JESSIE ALEXANDER RUSH, ) ACTION  
ROBERT JESUS BLANCAS, )  
SIMON SAGE YBARRA, and )  
KENNY MATTHEW MIKSCH, )  
Defendants. )

1       The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court  
 2 that the two above-captioned criminal cases are related. In CR 21-105 VC, Robert BLANCAS is  
 3 charged with enticement of a minor to engage in sexual activity (production of child pornography), in  
 4 violation of 18 U.S.C. § 2422(b). In CR 21-121 JD, BLANCAS and three others are charged with  
 5 conspiracy to obstruct justice by destroying records, in violation of 18 U.S.C. § 1512(k), and additional  
 6 counts of destroying records in official proceedings and obstructing official proceedings, in violation of  
 7 18 U.S.C. §§ 1512(c)(1) and (c)(2). Thus, both cases involve the same defendant, BLANCAS.

8       In addition, the government anticipates that there will be significant overlap in the evidence the  
 9 government produces in both cases. Both cases arose from the investigation of the militia group that  
 10 included Steven Carrillo, who is charged separately with murdering and attempting to murder federal  
 11 officers. As part of the investigation of that group, the government obtained search warrants for, and  
 12 seized and searched, numerous electronic devices, including the defendants' devices. As part of that  
 13 review, the government discovered evidence that BLANCAS had enticed a minor to produce child  
 14 pornography, as alleged in CR 21-105 VC, and that BLANCAS, Jessie RUSH, Simon YBARRA, and  
 15 Kenny MIKSCH destroyed records related to their and Carrillo's involvement in the militia group, as  
 16 well as communications related to the events that underlie the charges in Carrillo's federal and state  
 17 cases, as alleged in CR 21-121 JD. Thus, the government anticipates producing many of the same  
 18 search warrants, electronic evidence, and third-party records, to the defendants in both cases.

19       Based upon these facts, the cases are related within the meaning of Local Rule 8-1(b)(1) because  
 20 they involve the same defendant and the same events and occurrences. Furthermore, the cases are  
 21 related within the meaning of Local Rule 8-1(b)(2) because, if heard by separate judges, the actions  
 22 likely would involve substantial duplication of labor by the two judges.

23       Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment

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1 of these cases to a single judge is likely to conserve judicial resources and promote an efficient  
2 determination of each action.

3 DATED: April 9, 2021

Respectfully submitted,

4 STEPHANIE M. HINDS  
5 Acting United States Attorney

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7 /s/  
8 ERIC CHENG  
9 FRANK J. RIEBLI  
10 Assistant United States Attorneys

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